



"Improve the economic well-being of agriculture and enrich the quality of farm family life."

June 21, 2005

Regulatory Analysis and Development
Attn: Mr. Hammerschmidt
PPD, APHIS, Station 3C71
4700 River Road Unit 118
Riverdale, MD 20737-1238

In Reference To: Docket No. 05-015-1

Dear Mr. Hammerschmidt:

The Illinois Farm Bureau appreciates the opportunity to comment on the Draft Strategic Plan for the National Animal Identification System (NAIS). We have been a very strong proponent of this effort for many years and have appreciated the inclusive approach USDA-APHIS has taken regarding its development.

In regard to the critical issues, our organization would like to submit the following comments:

Voluntary versus Mandatory: We continue to support a phased-in mandatory identification program. In these initial stages, and until the confidentiality issues are resolved, the program can be voluntary. However, we strongly believe that USDA needs to make this a mandatory program as quickly as practically possible. We believe an aggressive approach, coupled with strong support from all partners, will send a unified message of confidence to the rest of the world, ensuring our place as a world leader in this effort.

Confidentiality: We feel the data collection and management needs to be held with USDA, and accessed in the event of an animal health occurrence that requires the traceback of animals. This data needs to be held confidential and should not be subject to the Freedom of Information Act. We are hopeful that parallel, privatized systems also develop – ones which would allow cow-calf producers to access cutout data on their calves or for dairymen to obtain production history on purchased animals, for example.

Financial: We also support the concept of a strong partnership. Producers, industry, and government need to work together to ensure our nation's high standards of animal health are not compromised. We are certainly realistic and supportive that some costs will be borne by producers (ear tags, readers, or reporting), but our concern is that other costs down the chain will be passed back to the producer in the form of lower prices. We need to make sure the cost of

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implementation is borne by all facets of industry, including the consumer. We feel that financial support from the government to help underwrite costs of implementation at all levels will be critical to making this program work.

Mr. Hammerschmidt, thank you again for the opportunity to comment on this important effort that is so critical to our nation's livestock producers.

Sincerely,

~~ILLINOIS FARM BUREAU~~

Philip Nelson
President



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